

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

Danny Goodman, Jr.

Case No. 6:15-bk-01852-CCJ

Chapter 7

Debtor.

**MOTION FOR REFERRAL TO MORTGAGE MODIFICATION MEDIATION AND
MOTION FOR ENLARGEMENT OF TIME TO FILE REAFFIRMATION AGREEMENT**

Debtor, Danny Goodman, Jr. ("Debtor"), by and through his undersigned counsel, requests entry of an order referring the Debtor and Specialized Loan Servicing ("SLS") encumbering residential property, whose mortgage lien encumbers the real property located at: 927 Strider Drive, Henderson, Nevada (the "Property") with a Mortgage Loan Number ending in 8735, to mortgage modification mediation, and for an enlargement of time to file a reaffirmation agreement between the Debtor and SLS, and in support states:

1. The Debtor would like to modify the terms of the SLS mortgage encumbering the Property. The Property is non-homestead, income producing property and Debtor shall pay seventy-five percent (75%) of the gross rental income generated by the Property.
2. Mediation will assist the parties in negotiation of a modification of the relevant mortgage(s).
3. Pursuant to 11 U.S.C § 524 and B.R.C.P. 4008, the Debtor is required to file a reaffirmation agreement no later than sixty (60) days after the first meeting of creditors. The Debtor's first meeting of creditors was conducted on April 7, 2015. Accordingly, the deadline within which Debtor is to file a reaffirmation agreement with SLS is June 10, 2015.

4. Should mediation be unsuccessful, the Debtor will seek to reaffirm the debt due to SLS and requests that the deadline of June 10, 2015, be extended for thirty days after the parties hold the mortgage mediation in order to allow the Debtor to file his reaffirmation agreement with SLS.

WHEREFORE, the Debtor requests the entry of an order referring this case to mediation, enlarging the time to file the reaffirmation agreement, and for such other and further relief the Court deems just and proper.

/s/ Michael A. Nardella

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ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 19, 2015 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served on May 19, 2015 by transmission of Notices of Electronic Filing generated by CM/ECF to those parties registered to receive electronic notices of filing in this case, as follows: Marie Henkel, Chapter 7 Trustee, at mehenkel@yahoo.com, mhenkel@ecf.epiqsystems.com; Office of the U.S. Trustee, at USTP.Region21.OR.ECF@usdoj.gov; and by FedEx, to: Specialized Loan Servicing, 8742 Lucent Blvd., Suite 300, Highlands Ranch, CO 80129.

/s/ Michael A. Nardella

Michael A. Nardella